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Draft Chesapeake Bay Total Maximum Daily Load

Comment On: EPA-R03-OW-2010-0736-0001

Clean Water Act Section 303(d): Notice for the Public Review of the Draft Total Maximum Daily Load (TMDL) for the Chesapeake Bay

Document: EPA-R03-OW-2010-0736-0613

Comment submitted by David Hartley, Eastern Panhandle Home Builders Association

Submitter Information

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Organization: Eastern Panhandle Home Builders Association

General Comment

The Eastern Panhandle Home Builders Association is a trade association of approximately 200 members in Berkeley, Jefferson and Morgan Counties of West Virginia.

The Chesapeake Bay TMDL will require many changes affecting our members in various aspects. Waste water treatment plants process effluent from houses we build and our members manage construction stormwater as well as construct storm water management facilities.

The creation and implementation of an interstate nutrient credit trading program would be essential for developers to meet the TMDL/West Virginia WIP. This is particularly true in our area because we are a relatively small part of the Chesapeake Bay Watershed and West Virginia's nutrient credit trading program may be not developed to a point where credits can be verified and sold. Without the interstate credit trading program, development would essentially stop here and the contributions from development to the TMDL would not happen.

There we urge EPA to fast track an interstate nutrient credit trading program for implementation before the current Constriction stormwater Permit expires in West Virginia so that options will be available can both project the Bay and make sense for business owners.